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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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|---------------------------|---|-------------------------------------|
| UNITED STATES OF AMERICA, |) | CASE NO. CR 14-0306 WHA |
| |) | CR 08-0222 WHA |
| Plaintiff, |) | |
| |) | NOTICE REGARDING DEFENDANT'S MOTION |
| v. |) | TO EXONERATE BOND |
| |) | |
| LUKE D. BRUGNARA, |) | |
| |) | |
| Defendant. |) | |

On December 15, 2014, defendant moved to exonerate his release bond. Dkt. 234. The government responded by stating it would not oppose such exoneration if defendant's then-pending motion for release were denied by Judge Alsup, and stated that it would notify this Court when that determination was made. Dkt. 245.

On December 19, 2014, Judge Alsup denied defendant's motion for release. Dkt. 249. That same day, however, Judge Alsup also issued a tentative order regarding a proposed set of furlough procedures, under which defendant would be permitted to visit with his attorney in the Attorney's Lounge in the federal building between 9:00 a.m. and 3:00 p.m. to prepare for trial. Dkt. 250. Today, Judge Alsup provided to the parties a modified version of such furlough procedures, and he ordered the

1 parties to file responses on this further proposed order. Dkt. 253, 255.

2 As part of the government's response today, the government requested that defendant be required
3 to withdraw his motion to revoke his bond in order to be furloughed. Dkt. 255 at 4. Thus, although
4 defendant's most recent motion for release from custody has been denied, the government continues to
5 oppose any revocation of the bond while it remains possible that defendant will be released from the
6 custody of the United States Marshals Service under any conditions—whether on pretrial release, to the
7 halfway house, or on furlough for six hours per day. The bond is justified given that, as this Court is
8 well aware, defendant has repeatedly violated the terms of his pretrial release in this case. The
9 government respectfully requests that this incentive for defendant to follow the terms and conditions set
10 by the court remain in place.

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12 DATED: December 22, 2014

13 /s/
14 W. DOUGLAS SPRAGUE
15 BENJAMIN KINGSLEY
16 Assistant United States Attorneys
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